



California State Fire Marshal **CODE INTERPRETATION**

Date Issued	10-21-03	Interpretation #	03-032
Topic	Fire Sprinkler System Inspections		
Code Section(s)	§904.5, Title 19, California Code of Regulations		
Requested by	John P. Joyce George M. Robinson & Co. 852 85 th St Oakland, CA 94621		

1. ***Is it the intent of Title 19 to inspect the fire protection system only as it is installed per §904.5 and affix a label while ignoring non-sprinklered areas, overspacing, or other apparent deficiencies?***

§904.5 refers only to the maintenance inspection requirements for automatic fire sprinkler systems. A license is not required to perform maintenance inspections. There is no requirement to affix a label. §904.1 (c) states, “The building or system owner shall insure immediate correction of any deficiencies noted during the maintenance inspection.”

However, when performing required service on an automatic fire sprinkler system, all items listed in §904.6 must be completed. The servicing concern is also required to conduct a full maintenance inspection as outlined in §904.5. During the 5-year service inspection, a service tag must not be placed on the system until all of the deficiencies are corrected.

2. ***Should a concern affix a label if the system satisfies the requirements of Title 19 regardless of noncompliance with the standards of NFPA 13?***

It is not the intent of the regulation to require that the system meet all provisions of NFPA 13. Deficiencies other than those outlined in Title 19 should be noted as recommendations for correction. It is the building owner’s responsibility to notify the local fire authority of identified deficiencies and ensure correction.

3. ***Do sprinkler heads above a drop ceiling need to be inspected?***

It is the intent of these regulations to ensure that all sprinkler heads are inspected at the time of required maintenance and service.